

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PAWANDEEP DHUNNA,)	No.: 2:21-cv-00720-BJR
)	
Plaintiff,)	STIPULATED MOTION AND ORDER TO
)	STAY LITIGATION
vs.)	
)	
DEPARTMENT OF HOMELAND)	
SECURITY, <i>et al.</i> ,)	
)	
Defendants.)	

Plaintiff Pawandeep Dhunna and Defendants the Department of Homeland Security, *et al.*, through their respective counsel, jointly stipulate and move for a 90-day stay of this litigation, including (1) the deadline for Defendants to respond to the Complaint, and (2) the deadlines in the Court's order (Dkt. #14) setting dates for the exchange of Initial Disclosures and filing a Combined Joint Status Report and Discovery Plan. The parties submit there is good cause to continue to stay the litigation.

On March 15, 2022, President Biden signed into law the Consolidated Appropriations Act, 2022. See <https://www.congress.gov/bill/117th-congress/house-bill/2471>. Division BB of this

1 appropriations law constitutes the EB-5 Reform and Integrity Act of 2022, which contains
2 authority for a new EB-5 Regional Center program. Pub. L. No. 117-103, div. BB § 103.

3 The Congressional authority for the new EB-5 Regional Center program contains various
4 reforms and implementation dates and will affect the processing of those EB-5 petitions and related
5 applications pending at the time of the 2021 expiration of the prior Regional Center program. On
6 April 11, 2022, the United States Citizenship and Immigration Service (“USCIS”) provided
7 official public guidance that it has “resumed processing regional center-based Form I-526,
8 Immigrant Petition by Alien Entrepreneur, filed on or before the sunset of the previous regional
9 center program on June 30, 2021.” <https://www.uscis.gov/i-526>.

10 Because USCIS may require additional time to process Plaintiff’s I-526 petition in
11 accordance with this recently-released guidance, the parties agree, through their respective counsel
12 of record, that an additional 90-day stay is appropriate. USCIS agrees to take initial adjudicatory
13 action on Plaintiff’s petition within 90 days. Initial adjudicatory action means issuing a Request
14 for Evidence, issuing a Notice of Intent to Deny, or approving or denying the petition. The parties
15 will file a joint status report within 90 days.

16 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

17 **ORDER**

18 **IT IS SO ORDERED.**

19 Dated this 22nd day of April, 2022.

20 

21 The Honorable Barbara J. Rothstein
22 United States District Court Judge